UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

-----X THOMAS GESUALDI, LOUIS BISIGNANO, MICHAEL O'TOOLE, MICHAEL C. BOURGAL, DARIN JEFFERS, FRANK H. FINKEL, MARC HERBST, THOMAS CORBETT, ROBERT G. WESSELS and ROCCO TOMASSETTI, SR., as Trustees and Fiduciaries of the Local 282 Welfare Trust Fund, the Local 282 Pension Trust Fund, the Local 282 Annuity Trust Fund, the Local 282 Job Training Fund, and the Local 282 Vacation and Sick Leave Trust Fund,

Civil Action No.: 2:24-cv-02049-SIL

Plaintiffs,

VS.

GWA MECHANICAL INC.,

Defendant.

MOTION FOR DEFAULT JUDGMENT

Plaintiffs hereby move the Court pursuant to Federal Rule of Civil Procedure 55(b)(2) and Local Civil Rule 55.2(b) to enter default judgment in favor of Plaintiffs and against Defendant GWA Mechanical Inc. on the ground that default has been entered against the Defendant for failure to answer or otherwise defend against the complaint. The Defendant is not an infant, incompetent, or in the military service of the United States.

Dated: New York, New York June 7, 2024

Respectfully submitted,

/s/ Michael S. Adler

Michael S. Adler COHEN, WEISS AND SIMON LLP 909 Third Avenue, 12th Floor New York, New York 10022

Telephone: (212) 563-4100 Facsimile: (646) 473-8251

madler@cwsny.com

Attorneys for Plaintiffs